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7/20/2023

United States District Court  
Central District Of California



Plaintiff: Michael Robert Graybill  
Defendant: United States Department of Justice

**2:23-CV-06222-UA**

Case Number:

COMPLAINT FOR VIOLATION OF THE HATCH ACT, FISA ACT OF 1978, AND  
OBSTRUCTION OF JUSTICE

#### I. INTRODUCTION

1. The Plaintiff, Michael Robert Graybill, brings this lawsuit against the United States Department of Justice (DOJ) for egregious violations of the Hatch Act, the Exception to Court Order Requirement of the Foreign Intelligence Surveillance Act of 1978 (FISA Act), and obstruction of justice. The Defendant's actions, as detailed below, have caused harm to the Plaintiff and undermined the trust of the American public in the integrity of the justice system.

#### II. JURISDICTION AND VENUE

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331, as the claims asserted herein arise under federal law.

3. Venue is proper in this district under 28 U.S.C. § 1391(b) because a substantial part of the events or omissions giving rise to the claims occurred within this district.

#### III. PARTIES

4. The Plaintiff, Michael Robert Graybill, is an American citizen, resident of Goleta, CA, and has standing to bring this lawsuit based on their rights as a citizen and their vested interest in the fair and lawful functioning of the government.

5. The Defendant, the United States Department of Justice (DOJ), is an agency of the federal government responsible for enforcing federal laws and upholding the principles of justice.

#### IV. FACTUAL BACKGROUND

6. Violation of the Hatch Act: The Hatch Act (5 U.S.C. §§ 7321-7326) prohibits federal employees, including those at the DOJ, from engaging in certain political activities. Despite clear evidence of illegal Executive Orders issued by the President, the DOJ has willfully refused to investigate these violations of the Hatch Act, thus enabling the President's unlawful actions.

7. Violation of the Exception to Court Order Requirement of the FISA Act: The FISA Act (50 U.S.C. § 1802) outlines the process for obtaining court orders to intercept communications of American citizens. However, the DOJ, under the direction of the President, has permitted the interception of communications of an American citizen without obtaining a court order for periods exceeding one year, thereby violating the FISA Act's safeguards and infringing on the individual's constitutional rights.

8. Obstruction of Justice: The DOJ, acting on behalf of the President, has engaged in a pattern of obstructing justice by impeding and obstructing lawful investigations into potential wrongdoing by the President. These actions have eroded the trust of the American public in the DOJ's ability to fairly and impartially enforce the law.

## V. CLAIMS FOR RELIEF

### COUNT I: VIOLATION OF THE HATCH ACT

9. The Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 6.

10. The DOJ's refusal to investigate and take appropriate action regarding the President's illegal Executive Orders constitutes a violation of the Hatch Act (5 U.S.C. §§ 7321-7326).

### COUNT II: VIOLATION OF THE FISA ACT OF 1978

11. The Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 7.

12. Allowing the President to intercept communications of an American without a court order for periods longer than a year, as permitted by the DOJ, is a direct violation of the Exception to Court Order Requirement of the FISA Act (50 U.S.C. § 1802).

### COUNT III: OBSTRUCTION OF JUSTICE

13. The Plaintiff incorporates by reference the allegations contained in paragraphs 1 through 8.

14. The DOJ's actions in obstructing justice on behalf of the President have damaged the Plaintiff and breached the trust of the American public in the impartiality of the justice system.

## VI. PRAYER FOR RELIEF

WHEREFORE, the Plaintiff respectfully requests that this Court:

1. Declare that the DOJ's actions have violated the Hatch Act, the Exception to Court Order Requirement of the FISA Act, and obstructed justice.
2. Enjoin the DOJ from further violating the Hatch Act, the FISA Act, and obstructing justice on behalf of the President.
3. Award the Plaintiff reasonable attorney's fees and costs incurred in this action.
4. Grant such other and further relief as this Court deems just and proper.

VII. JURY DEMAND

The Plaintiff demands a trial by jury on all issues so triable.

Respectfully submitted,

Michael Robert Graybill

A handwritten signature in black ink, appearing to be 'MR Graybill', with a long horizontal flourish extending to the right.

**FROM:**

Michael Graybill

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Carter CA 93117

7022 3330 0002 2648 4974



RDC 99



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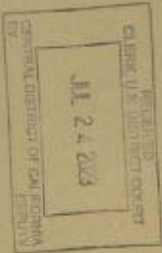
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